

Thomas & Solomon LLP  
THE EMPLOYMENT ATTORNEYS

March 27, 2017

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MAR 27 2017

MARIAN W. PAYSON  
U.S. Magistrate Judge  
Western District of New York

VIA FACSIMILE

Honorable Marian W. Payson  
United States District Court  
Western District of New York  
100 State Street  
Rochester, New York 14612

Re: Van Brunt-Piehler v. Absolute Software, Inc. et al.  
Civil Action No. 16-cv-06314-EAW-MWP

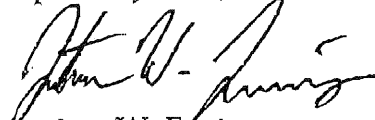
Dear Judge Payson:

I write on behalf of the parties in the above-referenced action. As indicated in the parties' March 17, 2017 letter to Your Honor, the parties have conferred about a modified scheduling order regarding the review and conferral of defendants' ESI and subsequent modifications to the search protocol. The parties have conferred regarding revised dates from the Court's January 11, 2017 scheduling order and propose the following dates:

- Deadline for plaintiff to review production and respond with proposed modifications to the search protocol: **April 28, 2017**
- Deadline for parties to meet and confer regarding modifications to the search protocol and to complete conferral process: **May 12, 2017**
- Deadline for defendants to provide any supplemental production of ESI pursuant to any modifications of the search protocol: **June 30, 2017**
- All other subsequent deadlines set forth in the January 11, 2017 scheduling order to be extended by 30 days.

If this request meets with your approval, a so-ordered line is included herein for your convenience. Please do not hesitate to contact me if you have any questions concerning this request. Thank you for your courtesies in this matter.

Respectfully submitted,

  
Jonathan W. Ferris

cc: David Singer, Esq. (via e-mail)  
Laura Lestrade, Esq. (via e-mail)  
Daniel Beebe, Esq. (via e-mail)

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*Request granted.*  
SO ORDERED:

*Marian W. Payson*

Honorable Marian W. Payson

United States Magistrate Judge

Dated: March 27, 2017